

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE NEW YORK TIMES COMPANY,

Plaintiff,

v.

OPENAI, INC., OPENAI LP, OPENAI GP,
LLC, OPENAI, LLC, OPENAI OPCO LLC,
OPENAI GLOBAL LLC, OAI CORPORATION,
LLC, OPENAI HOLDINGS, LLC, and
MICROSOFT CORPORATION,

Defendant.

ECF CASE

Civil Action No. 1:23-cv-11195-SHS

**DECLARATION IN SUPPORT
OF MOTION FOR ADMISSION
OF ATTORNEY PRO HAC VICE**

Ellie R. Dupler, declares:

1. I am an Associate with the law firm of Susman Godfrey L.L.P.
2. I submit this declaration in support of my motion for admission to practice *pro hac vice* in the above-captioned matter.
3. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing of the bar of the Supreme Court of California.
4. There are no pending disciplinary proceedings against me in any state or federal court.
5. I have never been convicted of a felony.
6. I have never been censured, suspended, disbarred or denied admission or readmission by any court.
7. My attorney registration number for the State Bar of California is 337607.

8. Wherefore, your declarant respectively submits that she be permitted to appear as counsel and advocate *pro hac vice* in case 1:23-cv-11195-SHS for Plaintiff (The New York Times Company).

I, Ellie R. Dupler, declare under penalty of perjury that the foregoing is true and correct.

Dated: January 4, 2024

Respectfully submitted,

/s/ Ellie R. Dupler

Ellie R. Dupler
CA State Bar No. 337607
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Attorney for Plaintiff